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October 21, 2015

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John Roy, Vice President
Connecticut Galvanizing Corporation
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Glastonbury, CT 06033-0358
Cert. Mail # 7014 0510 0000 7338 7668

Frank Luszczyk, President
Highway Safety Corporation
239 Commerce Street
Glastonbury, CT 06033-0358
Cert. Mail # 7014 0510 0000 7338 7675

Dear Messrs. Roy and Luszczyk:

I write on behalf of Environment America, Inc., d/b/a Environment Connecticut ("Environment Connecticut") and its members and Toxics Action Center ("TAC") and its members (collectively, the "Citizen Groups").

Highway Safety Corporation owns Connecticut Galvanizing Corporation and Highway Safety Design and Fabrication. These three companies (collectively, "the Companies") together own and operate a metal fabrication and galvanizing facility located at 239 Commerce Street in Glastonbury, Connecticut (collectively, "the Facility"). Based on available information, the Citizen Groups believe that the Companies have violated and will continue to violate (1) the federal Clean Water Act, 33 U.S.C. § 1251 *et seq.* and (2) National Pollutant Discharge Elimination System ("NPDES") Permit No. CT0030449 ("the Permit") issued to "Connecticut Galvanizing [Corporation], Div. Highway Safety Corp." ("CT Galvanizing") in operating the Facility.

Among other violations, the Companies have: (1) discharged stormwater from the Facility into Salmon Brook and Hubbard Brook that contains zinc, lead, copper, total

suspended solids (“TSS”), and oil and grease (“O & G”) in concentrations that exceed numeric effluent limitations in the Permit; (2) failed to implement adequate Best Management Practices (“BMPs”) at the Facility to reduce or eliminate the discharge of pollutants to the extent achievable using control measures that are technologically available and economically practicable and achievable in light of best industry practices, in violation of the requirements of the Permit; and (3) discharged stormwater from the Facility that has caused acute and chronic toxicity in Salmon Brook and Hubbard Brook, in violation of the requirements of the Permit. As set forth herein, these violations are ongoing, and will become more pronounced with the advent of new, more stringent permit limits as of October 1, 2015.

More specifically, the Companies’ violations are as follows:

I. Violations of Numeric Effluent Limitations

The Permit, in Section 5, sets the following instantaneous limits for stormwater discharge from the Facility for zinc, lead, copper, TSS, and O & G:

NPDES Permit CT0030449: Numeric Effluent Limitations				
<i>Parameter</i>	<i>Outfall</i>	<i>Limit 10/1/11- 3/31/14</i>	<i>Limit 4/1/14- 9/30/15</i>	<i>Limit 10/1/15- 9/29/16</i>
Total Zinc	001	--	0.16 mg/l	0.032 mg/l
	002	--	0.16 mg/l	0.16 mg/l
	003	--	0.16 mg/l	0.032 mg/l
Total Lead	001	--	0.076 mg/l	0.015 mg/l
	002	--	0.076 mg/l	0.076 mg/l
	003	--	0.076 mg/l	0.015 mg/l
Total Copper	001	--	0.059 mg/l	0.012 mg/l
	002	--	0.059 mg/l	0.059 mg/l
	003	--	0.059 mg/l	0.012 mg/l
Total Suspended Solids	001	90 mg/l	90 mg/l	90 mg/l
	002	90 mg/l	90 mg/l	90 mg/l
	003	90 mg/l	90 mg/l	90 mg/l
Total Oil & Grease	001	5.0 mg/l	5.0 mg/l	5.0 mg/l
	002	5.0 mg/l	5.0 mg/l	5.0 mg/l
	003	5.0 mg/l	5.0 mg/l	5.0 mg/l

These limits are applicable to all stormwater discharged from the Facility. The Permit requires CT Galvanizing to monitor its stormwater discharge based on samples collected during one storm event each quarter,¹ and further provides that these samples “shall be representative of the discharge during standard operating conditions.”

¹ The Permit defines sampling quarters as January-March, April-June, July-September, and October-December.

Table 1, attached, lists each instance, from October 2011 through September 2015, in which a stormwater sample monitored and reported by CT Galvanizing exceeded one or more of the limits set out above. Each such exceedance constitutes a violation of the applicable numeric effluent limit.

For each reported violation of a numeric effluent limit, the total number of days of violation for that calendar quarter is equal to the number of days of stormwater discharge events occurring during the quarter. Table 2, attached, lists the rainfall events from October 2011 through September 2015 in the Glastonbury area that were sufficient to generate a stormwater discharge. Table 2 indicates, based on the violation data in Table 1, which effluent limits – by parameter and outfall – were violated during each of these rainfall events. In Table 1, the column entitled “Total Days of Violation in Quarter” tabulates the total days of violation for each effluent limit using the data from Table 2.

Each effluent limitation violation described above constitutes a violation of the Permit and the Clean Water Act.

II. Violations of the Requirement to Implement BMPs

Section 9 of the Permit requires CT Galvanizing to develop and implement a Stormwater Pollution Prevention Plan (“SWPPP”). The Permit requires CT Galvanizing to implement BMPs as part of the SWPPP to reduce and/or eliminate the discharge of pollutants “to the extent achievable using control measures that are technologically available and economically practicable and achievable in light of best industry practice.”

The Facility’s numeric effluent limit violations detailed in Tables 1 and 2 demonstrate the extent to which the Companies have failed to reduce or eliminate the discharge of pollutants through the use of achievable control measures. These discharges have not only persistently violated the Permit’s numeric limitations, but have also violated stormwater discharge performance benchmarks set by the Connecticut Department of Energy and Environmental Protection (“DEEP”) and the United States Environmental Protection Agency (“EPA”) to help determine the effectiveness of pollution control measures. Performance benchmarks are relevant guidelines used to evaluate the efficacy of BMPs; the Facility’s failure to comply with these benchmarks indicates that its BMPs are inadequate.

Specifically, the Companies have failed to adequately implement the following BMPs as required by the Permit:

A. *Good Housekeeping Measures*

Permit Section 9(B)(2)(A) requires CT Galvanizing to “maintain a clean, orderly facility (e.g. sweeping at regular intervals, appropriate storage practices, proper garbage and waste management, dust control measures, etc.) in all areas that are exposed to rainfall and are potential sources of pollutants.” Section 9(B)(2)(G) also instructs CT Galvanizing to document “the schedule and procedures for implementation of control measures, monitoring and inspections,” including “sweeping, waste management practices and other good housekeeping measures.”

From the effective date of the Permit through the date of this letter, the Companies have failed to maintain exposed areas of the Facility in a clean, orderly state and have failed to adequately implement or document schedules and procedures for sweeping, waste management, dust control, or other good housekeeping measures.

B. Roof Areas

Permit Section 9(B)(2)(D) requires CT Galvanizing to “identify roof areas that may be subject to drippage, dust or particulates from exhausts or vents or other sources of pollution, . . . inspect or monitor the runoff from these areas to determine if any potential sources of stormwater pollution are present, [and] minimize such sources or potential sources of pollution.”

From the effective date of the Permit through the date of this letter, the Companies have failed to minimize the sources of pollution on roof areas throughout the Facility, in particular the roof of the Galvanizing Building, through the implementation of practicable and achievable control measures.

C. Exposed Materials

Permit Section 9(B)(2)(E) requires CT Galvanizing to “minimize the exposure to stormwater of materials identified in the ‘Inventory of Exposed Materials’ section” of the SWPPP.

From the effective date of the Permit through the date of this letter, the Companies have failed to minimize the exposure of materials identified in the “Inventory of Exposed Material” in the SWPPP – in particular the Facility’s outdoor storage areas and loading and unloading operations – through the use of roofing, covering, or other practicable and achievable control measures to shield these areas from stormwater exposure.

D. Filtration and Other Treatment Methods

The use of filtration and/or treatment systems to reduce the presence of pollutants in stormwater discharge is a control measure that would significantly reduce or eliminate the discharge of pollutants from the Facility. Permit Section 10(B) requires CT Galvanizing to install an AquaShield Aqua-Filter Filtration system (“AquaShield”) at Outfall 002, evaluate the effectiveness of the system, and either explore its potential applicability at Outfalls 001 and 003 or evaluate alternative methods of complying with the Permit’s effluent limitations.

From the effective date of the Permit through the date of this letter, the Companies have failed to install the AquaShield system and have neither installed nor evaluated the suitability and effectiveness of alternative runoff filtration or treatment systems.

E. Other Corrective Actions

Permit Section 9(D) requires CT Galvanizing to amend the SWPPP whenever “the actions required by the [SWPPP] fail to ensure or adequately protect against pollution of the surface waters of the states,” or when “necessary to address any significant sources or potential sources of pollution identified as a result of any inspection or visual monitoring,” or when “required as a result of monitoring benchmarks or effluent limitations.”

Despite the Facility’s persistent discharge of stormwater in violation of the Permit’s effluent limitations, the identification of multiple sources of pollution in the SWPPP, and the fact the SWPPP has failed to adequately protect against the pollution of Salmon and Hubbard Brooks, the Companies have failed to take necessary corrective actions to address the Facility’s pollutant discharge. The Companies have not implemented adequate corrective actions in response to continually elevated levels of zinc, lead, and copper in discharge samples.

From the effective date of the Permit through the date of this letter, the Companies have failed to amend the SWPPP or take other adequate corrective actions as required by Permit Section 9(D).

Every day that the Facility operates without implementing required BMPs, as set out above, the Companies violate the Permit and the Clean Water Act.

III. Acute and Chronic Toxicity

The Permit requires CT Galvanizing to monitor the aquatic toxicity of its quarterly stormwater discharge samples using “LC50” assays of aquatic organisms (neonatal *Daphnia pulex* and larval *Pimephales promelas*). An LC50 assay is an acute toxicity test in which test organisms are exposed to discharge samples diluted by fresh water at varying concentrations. Each of the diluted samples is then monitored for 48 hours to determine how much the effluent needs to be diluted before 50% of the test organisms will survive. The “result” of the assay testing is a concentration expressed in the form of a percentage – this result represents the lowest effluent concentration at which the discharge causes mortality to half of the test organisms. For example, if the assay yields an LC50 value of 70% for *Daphnia pulex*, that means that a concentration of 70% effluent and 30% fresh water caused mortality to half of the *Daphnia pulex* test organisms after 48 hours of exposure. If the assay yields a 10% LC50 value for *Daphnia pulex*, that means that a concentration of 10% effluent and 90% fresh water caused mortality to half of the test organisms after 48 hours of exposure. Because it results in mortality to the same proportion of organisms at a lower effluent concentration, a sample that causes mortality to half the organisms at 10% concentration is considered more acutely toxic than a sample that causes mortality to half the organisms at 70% concentration.

Section 4(B) of the Permit sets the following “general effluent limitation”: “No discharge shall cause acute or chronic toxicity in the receiving water body beyond any zone of influence specifically allocated to that discharge in this permit.” Connecticut

Water Discharge Permit Regulations define zone of influence generally as “the spatial area or volume of receiving water flow within which some degradation or water quality or use impairment is anticipated to occur as a result of a discharge.” Conn. Agencies Regs. § 22a-430-3(a)(3). To the Groups’ knowledge, no zone of influence has been specifically designated to CT Galvanizing at any of the three outfalls at the Facility. The LC50 data generated by CT Galvanizing, discussed below, demonstrate that the Facility is perpetually in violation of this general condition of the Permit because it discharges contaminated stormwater that causes acute and chronic toxicity in Salmon Brook and Hubbard Brook.

Further, effective October 1, 2015, the Permit now also places a numeric aquatic toxicity limit on the effluent discharged from Outfalls 001 and 003. This requirement is in addition to the limitation imposed in Section 4(B). This numeric effluent limit, set forth in Section 5 of the Permit, requires that the LC50 assay for both neonatal *Daphnia pulex* and larval *Pimephales promelas* yield a 90% or higher concentration result. This means that the Facility’s discharge from Outfalls 001 and 003 is not allowed to cause mortality to half of the test organisms after 48 hours of exposure at a diluted effluent concentration of less than 90% (i.e. 90% effluent and 10% fresh water).

Table 3, attached, lists the LC50 assay data for each sample taken by CT Galvanizing between October 2011 and September 2015, and demonstrates that the majority of discharge samples have fallen well short of the 90% concentration limit during that timeframe. All 64 of the LC50 assays performed on discharge from Outfalls 001 and 002 yielded concentrations lower than 90%. In fact, all of these assays yielded concentrations lower than 10%, meaning that during every quarter between October 2011 and September 2015 discharge from these two outfalls caused mortality to more than half of the test organisms at concentrations significantly lower than the benchmark determined by DEEP to be protective of aquatic life in Salmon Brook and Hubbard Brook. Similarly, 26 of the 28 LC50 assays performed on discharge samples from Outfall 003 fell short of the 90% concentration benchmark.

These LC50 testing data – which show that the Facility’s stormwater discharge is acutely toxic to aquatic life at low concentrations on a persistent basis – are evidence that the Facility’s stormwater discharges have caused toxicity in the receiving waters during each stormwater discharge event. Each time stormwater was discharged from the Facility, as listed in Table 2, the Companies violated Permit Section 4(B)’s narrative prohibition against causing acute or chronic toxicity in both Salmon Brook and Hubbard Brook, in violation of the Permit and the Clean Water Act. The testing data also demonstrate that the Companies are likely to be in violation of the numeric aquatic toxicity effluent limitation at Outfalls 001 and 003 in Permit Section 5 during every discharge event beginning October 1, 2015.

Additional information, including information in the Companies’ possession, may reveal further details about the violations described above and may reveal additional violations of the Clean Water Act at the Facility. This letter covers all violations of the more stringent and newly imposed limits beginning in the fourth quarter of 2015, and all violations revealed by additional information.

This letter is being provided pursuant to Section 505(b) of the Clean Water Act, 33 U.S.C. § 1365(b). The Citizen Groups intend to file suit against the Companies in federal court to secure appropriate relief under federal law for violations described in this notice letter occurring within five years immediately preceding the service of this letter. In doing so, the Citizen Groups seek to improve the water quality of Salmon Brook and Hubbard Brook by securing long-term compliance with applicable law.

The Citizen Groups would welcome the opportunity to discuss this matter with you. If you are interested in discussing the matter, or if you believe any of the above information is incorrect, if you take steps to permanently correct any of the described violations, if you believe you are currently in compliance with the Clean Water Act, or if you have any questions concerning this letter or the described violations, please contact me as soon as possible at (617) 747-4304 or at the address listed above. If you would like to meet in person to discuss this matter, I am available to meet at a mutually agreeable time and place.

Sincerely,



Kevin Budris

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encl.

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Table 1 -- Numeric Effluent Limit Violations in Samples and Violation Totals							
Parameter	Outfall	Quarter	Sample Date	Rainfall Total (inches)	Permit Limit (mg/l)	Reported Value (mg/l)	Total Days of Violation in Quarter
Zinc	001	Q2 2014	5/22/14	0.40	0.16	23.5	23
Zinc	001	Q3 2014	9/16/14	0.07	0.16	33	15
Zinc	001	Q4 2014	10/15/14	0.06	0.16	46.6	25
Zinc	001	Q1 2015	1/12/15	0.32	0.16	82.3	9
Zinc	001	Q2 2015	6/15/15	1.49	0.16	157	19
Zinc	001	Q3 2015	8/11/15	0.72	0.16	86	11
Zinc	002	Q2 2014	5/22/14	0.40	0.16	16	23
Zinc	002	Q3 2014	9/16/14	0.07	0.16	40.8	15
Zinc	002	Q4 2014	10/15/14	0.06	0.16	38.6	25
Zinc	002	Q1 2015	1/12/15	0.32	0.16	5.21	9
Zinc	002	Q2 2015	6/15/15	1.49	0.16	214	19
Zinc	002	Q3 2015	8/11/15	0.72	0.16	86	11
Zinc	003	Q2 2014	5/22/14	0.40	0.16	0.57	23
Zinc	003	Q3 2014	9/16/14	0.07	0.16	1.72	15
Zinc	003	Q4 2014	10/15/14	0.06	0.16	10.6	25
Zinc	003	Q1 2015	1/12/15	0.32	0.16	5.41	9
Lead	001	Q2 2014	5/22/14	0.40	0.076	0.495	23
Lead	001	Q3 2014	9/16/14	0.07	0.076	0.392	15
Lead	001	Q4 2014	10/15/14	0.06	0.076	0.561	25
Lead	001	Q1 2015	1/12/15	0.32	0.076	0.866	9
Lead	001	Q2 2015	6/15/15	1.49	0.076	1.02	19
Lead	001	Q3 2015	8/11/15	0.72	0.076	0.334	11
Lead	002	Q2 2014	5/22/14	0.40	0.076	0.44	23
Lead	002	Q3 2014	9/16/14	0.07	0.076	0.145	15
Lead	002	Q4 2014	10/15/14	0.06	0.076	0.535	25
Lead	002	Q2 2015	6/15/15	1.49	0.076	1.03	19
Lead	002	Q3 2015	8/11/15	0.72	0.076	0.557	11
Lead	003	Q1 2015	1/12/15	0.32	0.076	0.09	9
Copper	001	Q3 2014	9/16/14	0.07	0.059	0.146	15
Copper	001	Q1 2015	1/12/15	0.32	0.059	0.089	9
Copper	001	Q2 2015	6/15/15	1.49	0.059	0.064	19
Copper	001	Q3 2015	8/11/15	0.72	0.059	0.102	11
Copper	002	Q3 2014	9/16/14	0.07	0.059	0.146	15
Copper	002	Q4 2014	10/15/14	0.06	0.059	0.061	25
Copper	002	Q2 2015	6/15/15	1.49	0.059	0.09	19
Copper	002	Q3 2015	8/11/15	0.72	0.059	0.099	11
Copper	003	Q3 2014	9/16/14	0.07	0.059	0.158	15

Table 1 - 1

Table 1 – Numeric Effluent Limit Violations in Samples and Violation Totals							
Parameter	Outfall	Quarter	Sample Date	Rainfall Total (inches)	Permit Limit (mg/l)	Reported Value (mg/l)	Total Days of Violation in Quarter
Copper	003	Q1 2015	1/12/15	0.32	0.059	0.087	9
TSS	001	Q4 2011	11/10/11	0.36	90	219	22
TSS	001	Q1 2012	1/12/12	0.77	90	121	14
TSS	001	Q2 2012	5/8/12	0.19	90	123	19
TSS	001	Q4 2012	12/21/12	0.77	90	259	20
TSS	001	Q1 2013	2/27/13	0.73	90	142	9
TSS	001	Q2 2013	5/8/13	0.24	90	114	25
TSS	001	Q3 2013	11/26/13	2.24	90	167	20
TSS	001	Q4 2013	12/23/13	0.81	90	360	13
TSS	001	Q1 2014	3/12/14	0.10	90	93	15
TSS	001	Q4 2014	10/15/14	0.06	90	119	25
TSS	001	Q1 2015	1/12/15	0.32	90	123	9
TSS	001	Q2 2015	6/15/15	1.49	90	121	19
TSS	002	Q4 2011	11/10/11	0.36	90	120	22
TSS	002	Q1 2012	1/12/12	0.77	90	133	14
TSS	002	Q2 2012	5/8/12	0.19	90	129	19
TSS	002	Q3 2012	7/23/12	0.81	90	109	24
TSS	002	Q4 2012	12/21/12	0.77	90	210	20
TSS	002	Q1 2013	2/27/13	0.73	90	91	9
TSS	002	Q2 2013	5/8/13	0.24	90	102	25
TSS	002	Q3 2013	11/26/13	2.24	90	175	20
TSS	002	Q4 2013	12/23/13	0.81	90	263	13
TSS	002	Q1 2014	3/12/14	0.10	90	104	15
TSS	002	Q2 2014	5/22/14	0.40	90	105	23
TSS	002	Q4 2014	10/15/14	0.06	90	224	25
TSS	002	Q2 2015	6/15/15	1.49	90	187	19
TSS	002	Q3 2015	8/11/15	0.72	90	95	11
TSS	003	Q4 2011	11/10/11	0.36	90	480	22
TSS	003	Q1 2012	1/12/12	0.77	90	214	14
TSS	003	Q3 2012	7/23/12	0.81	90	169	24
TSS	003	Q4 2012	12/21/12	0.77	90	222	20
TSS	003	Q1 2013	2/27/13	0.73	90	221	9
TSS	003	Q2 2013	5/8/13	0.24	90	131	25
TSS	003	Q3 2013	11/26/13	2.24	90	202	20
TSS	003	Q4 2013	12/23/13	0.81	90	556	13
TSS	003	Q1 2014	3/12/14	0.10	90	603	15
TSS	003	Q2 2014	5/22/14	0.40	90	102	23

Table 1 - 2

Table 1 – Numeric Effluent Limit Violations in Samples and Violation Totals							
Parameter	Outfall	Quarter	Sample Date	Rainfall Total (inches)	Permit Limit (mg/l)	Reported Value (mg/l)	Total Days of Violation in Quarter
TSS	003	Q1 2015	1/12/15	0.32	90	168	9
O & G	001	Q4 2011	11/10/11	0.36	5	13.7	22
O & G	001	Q1 2012	1/12/12	0.77	5	7.3	14
O & G	001	Q2 2012	5/8/12	0.19	5	5.4	19
O & G	001	Q4 2012	12/21/12	0.77	5	7.5	20
O & G	001	Q4 2013	12/23/13	0.81	5	6.5	13
O & G	001	Q1 2015	1/12/15	0.32	5	7.3	9
O & G	002	Q4 2011	11/10/11	0.36	5	8.9	22
O & G	002	Q1 2012	1/12/12	0.77	5	15.8	14
O & G	002	Q2 2012	5/8/12	0.19	5	16.1	19
O & G	002	Q4 2012	12/21/12	0.77	5	8.8	20
O & G	002	Q3 2013	11/26/13	2.24	5	6.7	20
O & G	002	Q4 2014	10/15/14	0.06	5	5.5	25
O & G	002	Q1 2015	1/12/15	0.32	5	11.6	9
O & G	002	Q3 2015	8/11/15	0.72	5	156	11
O & G	003	Q1 2012	1/12/12	0.77	5	16.7	14
O & G	003	Q2 2012	5/8/12	0.19	5	5.2	19
O & G	003	Q4 2012	12/21/12	0.77	5	6.6	20
O & G	003	Q1 2013	2/27/13	0.73	5	16	9
O & G	003	Q3 2013	11/26/13	2.24	5	12.3	20
O & G	003	Q4 2013	12/23/13	0.81	5	10.1	13
O & G	003	Q1 2015	1/12/15	0.32	5	12.4	9

Table 2 -- Discharge Events and Numeric Effluent Limit Violations																	
Quarter	Date	Rainfall Total	Violations ("X" designates a violation)														
			Outfall 001					Outfall 002					Outfall 003				
			Zn	Pb	Cu	TSS	O&G	Zn	Pb	Cu	TSS	O&G	Zn	Pb	Cu	TSS	O&G
Q4 2011	10/1/11	0.09				X	X				X	X				X	
	10/2/11	0.16				X	X				X	X				X	
	10/3/11	0.41				X	X				X	X				X	
	10/4/11	0.15				X	X				X	X				X	
	10/13/11	1.35				X	X				X	X				X	
	10/14/11	0.78				X	X				X	X				X	
	10/19/11	0.76				X	X				X	X				X	
	10/20/11	0.09				X	X				X	X				X	
	10/27/11	0.75				X	X				X	X				X	
	10/29/11	0.97				X	X				X	X				X	
	11/10/11	0.54				X	X				X	X				X	
	11/16/11	0.82				X	X				X	X				X	
	11/22/11	0.38				X	X				X	X				X	
	11/23/11	0.96				X	X				X	X				X	
	11/29/11	0.82				X	X				X	X				X	
	12/6/11	0.29				X	X				X	X				X	
	12/7/11	2.01				X	X				X	X				X	
	12/8/11	0.72				X	X				X	X				X	
	12/21/11	0.15				X	X				X	X				X	
	12/23/11	0.53				X	X				X	X				X	
	12/27/11	0.75				X	X				X	X				X	
	12/31/11	0.06				X	X				X	X				X	
Q1 2012	1/1/12	0.08				X	X				X	X				X	X
	1/12/12	0.77				X	X				X	X				X	X
	1/23/12	0.14				X	X				X	X				X	X

Table 2 - 1

Table 2 -- Discharge Events and Numeric Effluent Limit Violations																	
Quarter	Date	Rainfall Total	Violations ("X" designates a violation)														
			Outfall 001					Outfall 002					Outfall 003				
			Zn	Pb	Cu	TSS	O&G	Zn	Pb	Cu	TSS	O&G	Zn	Pb	Cu	TSS	O&G
	1/26/12	0.16				X	X				X	X				X	X
	1/27/12	0.52				X	X				X	X				X	X
	2/16/12	0.10				X	X				X	X				X	X
	2/24/12	0.55				X	X				X	X				X	X
	2/29/12	0.30				X	X				X	X				X	X
	3/1/12	0.32				X	X				X	X				X	X
	3/2/12	0.09				X	X				X	X				X	X
	3/3/12	0.26				X	X				X	X				X	X
	3/9/12	0.13				X	X				X	X				X	X
	3/28/12	0.12				X	X				X	X				X	X
	3/31/12	0.16				X	X				X	X				X	X
Q2 2012	4/12/12	0.06				X	X				X	X					X
	4/22/12	1.89				X	X				X	X					X
	4/23/12	0.83				X	X				X	X					X
	5/1/12	0.44				X	X				X	X					X
	5/3/12	0.22				X	X				X	X					X
	5/8/12	0.19				X	X				X	X					X
	5/9/12	0.13				X	X				X	X					X
	5/10/12	0.46				X	X				X	X					X
	5/15/12	0.85				X	X				X	X					X
	5/21/12	0.12				X	X				X	X					X
	5/22/12	0.34				X	X				X	X					X
	5/29/12	0.35				X	X				X	X					X
	6/2/12	1.76				X	X				X	X					X
	6/6/12	0.17				X	X				X	X					X

Table 2 - 2

Table 2 -- Discharge Events and Numeric Effluent Limit Violations																	
Quarter	Date	Rainfall Total	Violations ("X" designates a violation)														
			Outfall 001					Outfall 002					Outfall 003				
			Zn	Pb	Cu	TSS	O&G	Zn	Pb	Cu	TSS	O&G	Zn	Pb	Cu	TSS	O&G
	6/12/12	0.17				X	X				X	X					X
	6/13/12	0.69				X	X				X	X					X
	6/22/12	1.03				X	X				X	X					X
	6/23/12	0.31				X	X				X	X					X
	6/25/12	0.63				X	X				X	X					X
Q3 2012	7/1/12	0.19									X					X	
	7/4/12	0.08									X					X	
	7/15/12	0.25									X					X	
	7/18/12	0.16									X					X	
	7/20/12	0.29									X					X	
	7/23/12	0.81									X					X	
	7/26/12	0.14									X					X	
	7/27/12	0.21									X					X	
	7/28/12	1.33									X					X	
	7/29/12	0.41									X					X	
	8/1/12	0.08									X					X	
	8/5/12	0.96									X					X	
	8/10/12	2.14									X					X	
	8/11/12	0.08									X					X	
	8/15/12	0.43									X					X	
	8/16/12	0.07									X					X	
	8/17/12	0.60									X					X	
	8/18/12	0.18									X					X	
	8/28/12	0.19									X					X	
	9/5/12	0.55									X					X	

Table 2 - 3

Table 2 -- Discharge Events and Numeric Effluent Limit Violations																	
Quarter	Date	Rainfall Total	Violations ("X" designates a violation)														
			Outfall 001					Outfall 002					Outfall 003				
			Zn	Pb	Cu	TSS	O&G	Zn	Pb	Cu	TSS	O&G	Zn	Pb	Cu	TSS	O&G
	9/8/12	0.58									X					X	
	9/18/12	1.30									X					X	
	9/22/12	0.33									X					X	
	9/28/12	1.18									X					X	
Q4 2012	10/2/12	0.91				X	X				X	X				X	X
	10/4/12	0.59				X	X				X	X				X	X
	10/7/12	0.12				X	X				X	X				X	X
	10/10/12	0.25				X	X				X	X				X	X
	10/15/12	0.31				X	X				X	X				X	X
	10/19/12	0.58				X	X				X	X				X	X
	10/23/12	0.11				X	X				X	X				X	X
	11/8/12	0.06				X	X				X	X				X	X
	11/13/12	0.18				X	X				X	X				X	X
	11/27/12	0.14				X	X				X	X				X	X
	12/7/12	0.10				X	X				X	X				X	X
	12/8/12	0.25				X	X				X	X				X	X
	12/9/12	0.14				X	X				X	X				X	X
	12/10/12	0.18				X	X				X	X				X	X
	12/17/12	0.31				X	X				X	X				X	X
	12/18/12	0.80				X	X				X	X				X	X
	12/20/12	0.10				X	X				X	X				X	X
	12/21/12	0.77				X	X				X	X				X	X
	12/26/12	0.28				X	X				X	X				X	X
	12/27/12	0.37				X	X				X	X				X	X
Q1 2013	1/11/13	0.18				X					X					X	X

Table 2 - 4

Table 2 -- Discharge Events and Numeric Effluent Limit Violations																	
Quarter	Date	Rainfall Total	Violations ("X" designates a violation)														
			Outfall 001					Outfall 002					Outfall 003				
			Zn	Pb	Cu	TSS	O&G	Zn	Pb	Cu	TSS	O&G	Zn	Pb	Cu	TSS	O&G
	1/16/13	0.41				X					X					X	X
	1/31/13	0.91				X					X					X	X
	2/19/13	0.14				X					X					X	X
	2/23/13	0.08				X					X					X	X
	2/27/13	0.79				X					X					X	X
	3/12/13	0.90				X					X					X	X
	3/19/13	0.30				X					X					X	X
	3/31/13	0.14				X					X					X	X
Q2 2013	4/10/13	0.45				X					X					X	
	4/12/13	0.40				X					X					X	
	4/20/13	0.34				X					X					X	
	5/8/13	0.24				X					X					X	
	5/9/13	0.36				X					X					X	
	5/11/13	0.35				X					X					X	
	5/19/13	0.13				X					X					X	
	5/22/13	0.09				X					X					X	
	5/23/13	0.74				X					X					X	
	5/24/13	0.58				X					X					X	
	5/25/13	0.33				X					X					X	
	5/29/13	1.04				X					X					X	
	6/3/13	0.67				X					X					X	
	6/6/13	0.16				X					X					X	
	6/7/13	2.98				X					X					X	
	6/8/13	0.33				X					X					X	
	6/10/13	0.79				X					X					X	

Table 2 - 5

Table 2 -- Discharge Events and Numeric Effluent Limit Violations																	
Quarter	Date	Rainfall Total	Violations ("X" designates a violation)														
			Outfall 001					Outfall 002					Outfall 003				
			Zn	Pb	Cu	TSS	O&G	Zn	Pb	Cu	TSS	O&G	Zn	Pb	Cu	TSS	O&G
	6/11/13	1.26				X					X					X	
	6/13/13	1.75				X					X					X	
	6/14/13	0.74				X					X					X	
	6/17/13	0.07				X					X					X	
	6/18/13	0.85				X					X					X	
	6/25/13	0.29				X					X					X	
	6/27/13	0.83				X					X					X	
	6/28/13	0.52				X					X					X	
Q3 2013	7/1/13	0.15				X					X	X				X	X
	7/7/13	0.09				X					X	X				X	X
	7/10/13	0.55				X					X	X				X	X
	7/11/13	0.17				X					X	X				X	X
	7/13/13	0.44				X					X	X				X	X
	7/23/13	0.57				X					X	X				X	X
	7/25/13	0.11				X					X	X				X	X
	7/26/13	0.31				X					X	X				X	X
	8/1/13	0.32				X					X	X				X	X
	8/2/13	0.19				X					X	X				X	X
	8/3/13	0.10				X					X	X				X	X
	8/8/13	0.12				X					X	X				X	X
	8/9/13	1.15				X					X	X				X	X
	8/26/13	0.48				X					X	X				X	X
	8/27/13	0.90				X					X	X				X	X
	8/31/13	0.27				X					X	X				X	X
	9/1/13	0.16				X					X	X				X	X

Table 2 - 6

Table 2 -- Discharge Events and Numeric Effluent Limit Violations																		
Quarter	Date	Rainfall Total	Violations ("X" designates a violation)															
			Outfall 001					Outfall 002					Outfall 003					
			Zn	Pb	Cu	TSS	O&G	Zn	Pb	Cu	TSS	O&G	Zn	Pb	Cu	TSS	O&G	
	9/2/13	0.25				X					X	X				X	X	
	9/12/13	1.27				X					X	X				X	X	
	9/22/13	0.82				X					X	X				X	X	
Q4 2013	10/6/13	1.11				X	X				X					X	X	
	10/7/13	0.55				X	X				X					X	X	
	10/19/13	0.07				X	X				X					X	X	
	10/31/13	0.11				X	X				X					X	X	
	11/1/13	0.18				X	X				X					X	X	
	11/7/13	0.18				X	X				X					X	X	
	11/18/13	0.29				X	X				X					X	X	
	11/22/13	0.15				X	X				X					X	X	
	11/26/13	0.20				X	X				X					X	X	
	11/27/13	2.04				X	X				X					X	X	
	12/6/13	0.43				X	X				X					X	X	
	12/23/13	0.81				X	X				X					X	X	
	12/29/13	0.97				X	X				X					X	X	
Q1 2014	1/5/14	0.09				X					X					X		
	1/6/14	0.60				X					X					X		
	1/10/14	0.07				X					X					X		
	1/11/14	0.51				X					X					X		
	1/14/14	0.63				X					X					X		
	2/13/14	0.62				X					X					X		
	2/14/14	0.17				X					X					X		
	2/20/14	0.09				X					X					X		
	2/21/14	0.13				X					X					X		

Table 2 - 7

Table 2 -- Discharge Events and Numeric Effluent Limit Violations																	
Quarter	Date	Rainfall Total	Violations ("X" designates a violation)														
			Outfall 001					Outfall 002					Outfall 003				
			Zn	Pb	Cu	TSS	O&G	Zn	Pb	Cu	TSS	O&G	Zn	Pb	Cu	TSS	O&G
	3/12/14	0.33				X					X					X	
	3/19/14	0.53				X					X					X	
	3/28/14	0.14				X					X					X	
	3/29/14	1.36				X					X					X	
	3/30/14	1.03				X					X					X	
	3/31/14	0.55				X					X					X	
Q2 2014	4/4/14	0.11	X	X				X	X		X		X			X	
	4/7/14	0.10	X	X				X	X		X		X			X	
	4/8/14	0.34	X	X				X	X		X		X			X	
	4/11/14	0.07	X	X				X	X		X		X			X	
	4/15/14	1.54	X	X				X	X		X		X			X	
	4/23/14	0.08	X	X				X	X		X		X			X	
	4/26/14	0.98	X	X				X	X		X		X			X	
	4/30/14	1.64	X	X				X	X		X		X			X	
	5/1/14	0.86	X	X				X	X		X		X			X	
	5/8/14	0.10	X	X				X	X		X		X			X	
	5/9/14	0.12	X	X				X	X		X		X			X	
	5/10/14	0.78	X	X				X	X		X		X			X	
	5/15/14	0.10	X	X				X	X		X		X			X	
	5/16/14	0.11	X	X				X	X		X		X			X	
	5/17/14	1.41	X	X				X	X		X		X			X	
	5/22/14	0.40	X	X				X	X		X		X			X	
	5/23/14	0.70	X	X				X	X		X		X			X	
	5/27/14	0.29	X	X				X	X		X		X			X	
	5/30/14	0.12	X	X				X	X		X		X			X	

Table 2 - 8

Table 2 -- Discharge Events and Numeric Effluent Limit Violations																	
Quarter	Date	Rainfall Total	Violations ("X" designates a violation)														
			Outfall 001					Outfall 002					Outfall 003				
			Zn	Pb	Cu	TSS	O&G	Zn	Pb	Cu	TSS	O&G	Zn	Pb	Cu	TSS	O&G
	6/5/14	0.33	X	X				X	X		X		X			X	
	6/13/14	0.57	X	X				X	X		X		X			X	
	6/19/14	0.10	X	X				X	X		X		X			X	
	6/26/14	0.13	X	X				X	X		X		X			X	
Q3 2014	7/2/14	1.03	X	X	X			X	X	X			X		X		
	7/3/14	1.61	X	X	X			X	X	X			X		X		
	7/4/14	0.38	X	X	X			X	X	X			X		X		
	7/14/14	1.08	X	X	X			X	X	X			X		X		
	7/15/14	0.29	X	X	X			X	X	X			X		X		
	7/23/14	0.15	X	X	X			X	X	X			X		X		
	7/27/14	0.21	X	X	X			X	X	X			X		X		
	8/2/14	0.11	X	X	X			X	X	X			X		X		
	8/4/14	0.14	X	X	X			X	X	X			X		X		
	8/13/14	1.68	X	X	X			X	X	X			X		X		
	8/31/14	0.72	X	X	X			X	X	X			X		X		
	9/6/14	0.07	X	X	X			X	X	X			X		X		
	9/13/14	0.24	X	X	X			X	X	X			X		X		
	9/16/14	0.07	X	X	X			X	X	X			X		X		
	9/21/14	0.75	X	X	X			X	X	X			X		X		
Q4 2014	10/1/14	0.97	X	X		X		X	X	X	X	X	X				
	10/4/14	0.78	X	X		X		X	X	X	X	X	X				
	10/11/14	0.26	X	X		X		X	X	X	X	X	X				
	10/15/14	0.06	X	X		X		X	X	X	X	X	X				
	10/16/14	1.03	X	X		X		X	X	X	X	X	X				
	10/22/14	0.58	X	X		X		X	X	X	X	X	X				

Table 2 - 9

Table 2 -- Discharge Events and Numeric Effluent Limit Violations																	
Quarter	Date	Rainfall Total	Violations ("X" designates a violation)														
			Outfall 001					Outfall 002					Outfall 003				
			Zn	Pb	Cu	TSS	O&G	Zn	Pb	Cu	TSS	O&G	Zn	Pb	Cu	TSS	O&G
	10/24/14	0.09	X	X		X		X	X	X	X	X	X				
	10/29/14	0.08	X	X		X		X	X	X	X	X	X				
	11/1/14	0.31	X	X		X		X	X	X	X	X	X				
	11/6/14	0.23	X	X		X		X	X	X	X	X	X				
	11/13/14	0.13	X	X		X		X	X	X	X	X	X				
	11/17/14	1.39	X	X		X		X	X	X	X	X	X				
	11/24/14	0.62	X	X		X		X	X	X	X	X	X				
	11/26/14	1.14	X	X		X		X	X	X	X	X	X				
	12/3/14	0.19	X	X		X		X	X	X	X	X	X				
	12/5/14	0.23	X	X		X		X	X	X	X	X	X				
	12/6/14	0.82	X	X		X		X	X	X	X	X	X				
	12/9/14	1.91	X	X		X		X	X	X	X	X	X				
	12/10/14	0.21	X	X		X		X	X	X	X	X	X				
	12/16/14	0.14	X	X		X		X	X	X	X	X	X				
	12/17/14	0.15	X	X		X		X	X	X	X	X	X				
	12/23/14	0.12	X	X		X		X	X	X	X	X	X				
	12/24/14	0.54	X	X		X		X	X	X	X	X	X				
	12/25/14	0.10	X	X		X		X	X	X	X	X	X				
	12/28/14	0.11	X	X		X		X	X	X	X	X	X				
Q1 2015	1/4/15	0.26	X	X	X	X	X	X				X	X	X	X	X	X
	1/12/15	0.32	X	X	X	X	X	X				X	X	X	X	X	X
	3/3/15	0.52	X	X	X	X	X	X				X	X	X	X	X	X
	3/4/15	0.06	X	X	X	X	X	X				X	X	X	X	X	X
	3/10/15	0.10	X	X	X	X	X	X				X	X	X	X	X	X
	3/14/15	0.59	X	X	X	X	X	X				X	X	X	X	X	X

Table 2 - 10

Table 2 -- Discharge Events and Numeric Effluent Limit Violations																	
Quarter	Date	Rainfall Total	Violations ("X" designates a violation)														
			Outfall 001					Outfall 002					Outfall 003				
			Zn	Pb	Cu	TSS	O&G	Zn	Pb	Cu	TSS	O&G	Zn	Pb	Cu	TSS	O&G
	3/25/15	0.06	X	X	X	X	X	X				X	X	X	X	X	X
	3/26/15	0.28	X	X	X	X	X	X				X	X	X	X	X	X
	3/27/15	0.14	X	X	X	X	X	X				X	X	X	X	X	X
Q2 2015	4/3/15	0.08	X	X	X	X		X	X	X	X						
	4/4/15	0.27	X	X	X	X		X	X	X	X						
	4/5/15	0.08	X	X	X	X		X	X	X	X						
	4/7/15	0.18	X	X	X	X		X	X	X	X						
	4/8/15	0.18	X	X	X	X		X	X	X	X						
	4/10/15	0.39	X	X	X	X		X	X	X	X						
	4/17/15	0.09	X	X	X	X		X	X	X	X						
	4/20/15	1.90	X	X	X	X		X	X	X	X						
	4/21/15	0.34	X	X	X	X		X	X	X	X						
	4/22/15	0.09	X	X	X	X		X	X	X	X						
	5/19/15	0.53	X	X	X	X		X	X	X	X						
	5/31/15	0.89	X	X	X	X		X	X	X	X						
	6/1/15	1.84	X	X	X	X		X	X	X	X						
	6/2/15	0.34	X	X	X	X		X	X	X	X						
	6/15/15	1.49	X	X	X	X		X	X	X	X						
	6/21/15	0.60	X	X	X	X		X	X	X	X						
	6/23/15	0.14	X	X	X	X		X	X	X	X						
	6/27/15	0.36	X	X	X	X		X	X	X	X						
	6/28/15	0.72	X	X	X	X		X	X	X	X						
Q3 2015	7/14/15	0.20	X	X	X			X	X	X	X	X					
	7/30/15	0.19	X	X	X			X	X	X	X	X					
	8/11/15	0.72	X	X	X			X	X	X	X	X					

Table 2 - 11

Table 2 -- Discharge Events and Numeric Effluent Limit Violations																	
Quarter	Date	Rainfall Total	Violations ("X" designates a violation)														
			Outfall 001					Outfall 002					Outfall 003				
			Zn	Pb	Cu	TSS	O&G	Zn	Pb	Cu	TSS	O&G	Zn	Pb	Cu	TSS	O&G
	8/15/15	0.41	X	X	X			X	X	X	X	X					
	8/21/15	0.22	X	X	X			X	X	X	X	X					
	9/10/15	0.98	X	X	X			X	X	X	X	X					
	9/11/15	0.08	X	X	X			X	X	X	X	X					
	9/12/15	0.19	X	X	X			X	X	X	X	X					
	9/13/15	0.19	X	X	X			X	X	X	X	X					
	9/29/15	0.21	X	X	X			X	X	X	X	X					
	9/30/15	1.75	X	X	X			X	X	X	X	X					

Table 3 – Aquatic Toxicity Monitoring Data							
Quarter	Sample Date	Outfall 001		Outfall 002		Outfall 003	
		Daphnia Pulex LC50	Pimephales promelas LC50	Daphnia Pulex LC50	Pimephales promelas LC50	Daphnia Pulex LC50	Pimephales promelas LC50
11/10/11	Q4 2011	< 3.0%	< 3.0%	< 3.0%	< 3.0%	60.20%	44.90%
1/12/12	Q1 2012	< 6.25%	< 6.25%	< 6.25%	< 6.25%	66.00%	< 6.25%
5/8/12	Q2 2012	< 6.25%	< 6.25%	< 6.25%	< 6.25%	58.80%	7.43%
7/23/12	Q3 2012	8.41%	< 6.25%	< 6.25%	< 6.25%	55.00%	12.50%
12/21/12	Q4 2012	< 6.25%	< 6.25%	< 6.25%	< 6.25%	55.20%	12.90%
2/27/13	Q1 2013	< 6.25%	< 6.25%	< 6.25%	< 6.25%	100%	9.81%
5/8/13	Q2 2013	< 6.25%	< 6.25%	< 6.25%	< 6.25%	29.70%	< 6.25%
11/26/13	Q3 2013	< 6.25%	7.59%	< 6.25%	< 6.25%	100%	32.40%
12/23/13	Q4 2013	< 6.25%	< 6.25%	< 6.25%	< 6.25%	< 6.25%	< 6.25%
3/12/14	Q1 2014	< 6.25%	< 6.25%	< 6.25%	< 6.25%	44.50%	< 6.25%
5/22/14	Q2 2014	< 6.25%	< 6.25%	< 6.25%	< 6.25%	35.90%	8.11%
9/16/14	Q3 2014	< 6.25%	< 6.25%	< 6.25%	< 6.25%	40.60%	< 6.25%
10/15/14	Q4 2014	< 6.25%	< 6.25%	< 6.25%	< 6.25%	< 6.25%	< 6.25%
1/12/15	Q1 2015	< 6.25%	< 6.25%	< 6.25%	< 6.25%	20.30%	< 6.25%
6/15/15	Q2 2015	< 6.25%	< 6.25%	< 6.25%	< 6.25%	---	---
8/11/15	Q3 2015	< 6.25%	< 6.25%	< 6.25%	< 6.25%	---	---

Table 3 - 1